



Public Communications Policy

Section: Operations and Governance	Attachment(s): <ul style="list-style-type: none">• Format for Press Releases• Social Media Comment and Posting – Terms of Use
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Section 1: Policy Statement

As part of its commitment to transparency and to building public understanding of various topics under review, Centre County Government will provide the public and media with accurate, consistent and up-to-date information.

Section 2: Overview

This policy covers the release of information to the public through the internet and news and information media, regardless of the form: verbal, print or electronic. This policy does not apply to Centre County's elected officials who have their own registered Right-to-Know officer separate from the County's Right-to-Know officer.

Section 3: Provisions

All news releases, event and public service announcements, desk statements, newspaper, television and radio interviews, and articles to be submitted for publication will be issued by the County's "Public Information Officer". This procedure becomes effective upon the date of this policy's adoption by the Centre County Board of Commissioners.

Within that context, multiple methods exist for disseminating information.

- **News Releases / Press Conferences / Event and Public Service Announcements:** Information distributed when Centre County Government and/or its departments initiate, advance or conclude a matter that is of interest to the public; or when Centre County Government announces an upcoming event; or at times when it is important to inform the public of safety precautions and health considerations. These releases can include statements about official County business, the County's viewpoint on issues and actions that fall under Pennsylvania County Government purview, invitations to upcoming public meetings, and/or concerns for the general welfare of the County residents. Copies of all news releases / press conferences / event and public service announcements will be retained by the designated County "Public Information Officer" or designee for record retention purposes.
- **News Media Requests** pertaining to County government matters fall into the three broad categories listed below. Copies of all desk statements and published articles will be retained by the designated County "Public Information Officer" or designee for record retention purposes.
 - **Desk Statements:** These releases will be prepared by County employees in collaboration with the County Administrator or designee and sent by the County's "Public Information Officer" in response to a request from a media source for information in advance of an event, or discussion of an issue, or as a follow-up to public discussion.
 - **Exclusive Television or Radio Interviews:** This typically occurs if a news reporter is interested in or is working on a particular issue and calls County department personnel about a story. Interviews of this nature provide the reporter, and ultimately the public, with more extensive information than what would typically be provided in a news release or public meeting. It is not unusual for these to be impromptu. However, it is imperative that these interviews are authorized by the County's Public Information Officer and that they refrain from op-ed comments (See Section 6: Definitions).
 - **Published Articles:** Stories written for an outside publication by an employee in either an individual capacity or in an official capacity, and released for publication by the County's Public Information Officer.

- Internet Based Communications comprise two formats:
 - Departmental Website Development: Websites containing a collection of web pages that facilitate communication between County government and the public.
 - Social Media Postings: Social media includes various forms of electronic communication through which County employees may post content of any sort on the Internet, regardless of the site's affiliation with Centre County Government. It includes, but is not limited to, the following forms and the interactive tools and functions they provide to users.
 - Social Networks that connect with people (Facebook, Twitter, LinkedIn),
 - Media Sharing Networks for sharing photos and video (Instagram, Snapchat, YouTube),
 - Discussion Forums for sharing news, information and ideas (Reddit, Quora, Digg),
 - Blogging and Publishing Networks for posting content online (WordPress, Tumblr, Medium), and
 - Bookmarking and content curation networks for saving and sharing trending content (Pinterest, Flipboard).

All use of social media by County employees, volunteers, contractors and interns must be compliant with applicable federal, state, and local laws. These include, but are not limited to, the Pennsylvania Right-to-Know Law, the Pennsylvania and federal Constitutions, Section 508 of the Rehabilitation Act of 1998, and the Pennsylvania Sunshine Act.

Retaliation

Centre County Government prohibits taking negative action against any employee for reporting a possible deviation from this policy or for cooperation in an investigation. Any employee who retaliates against another employee for reporting a possible deviation from this policy or for cooperating in an investigation will be subject to disciplinary action, up to and including termination.

Section 4: Procedures

The roles and responsibilities of Centre County employees when conducting public outreach have been developed to ensure consistent use of the County's preferred "press release" format and consistent distribution to all media outlets reaching the County's geographic service area. When conducting media outreach, do the following.

- News releases et al (as defined above in Section 3) must be prepared in collaboration with the Centre County Administrator or designee and issued by the Centre County Public Information Officer. These are typically distributed electronically as digital text to a broad list of local media providers. Exclusions are provided for emergency announcements related to the public's health and safety and issued by the designated County "Public Information Officer" in coordination with Emergency Operation Center staff. See Attachment 1 for the County's preferred format. In all cases, news releases must be distributed on the letterhead of the Centre County Board of Commissioners.
- News Media Requests occur when a County employee or representative is contacted by the media for additional information. Desk statements and exclusive interviews fall within this category. All news media requests must be forwarded to the County's Public Information Officer upon receipt.
- Published Articles must be prepared and reviewed by the County Administrator or designee and submitted per the directive of the County Commissioners' Office by the County's "Public Information Officer".

- Departmental Websites requires: (1) concept approval by the County Administrator or designee prior to site development; and (2) final “go-live” approval. See Section 5 for details.
- Social Media presents a wide variety of opportunities and carries with it certain responsibilities defined in more detail in Section 5. Content to be shared on social media must meet the following parameters.
 - Relevant. Information that helps residents and visitors and pertains to their daily lives.
 - Timely: Information about deadlines, upcoming events, news or current events.
 - Actionable: Information to register, attend, go or do.

Section 5: Internet Based Communication Guidelines

Departmental Website Development

With the exception of Geographic Information Systems (GIS) website mapping applications, and under extenuating circumstances, separate and distinct departments under Centre County Government who substantiate their case may establish a website independent of the County website provided they comply with the following prescribed two-step approval process. All content to be included on the independent website must be developed and, when necessary, redesigned with the approval by the department head requesting the website. Independent websites must clearly identify that the website has been created and is managed by an identifiable County department. Website maintenance is the responsibility of the department establishing the independent website and content must be up-to-date. In the event that a website is out of date, the County Administrator or designee will take steps to remove it.

- Concept Approval requires submittal of the following information for review and approval by the County Administrator or designee:
 - Department Name
 - Website Purpose and Goals
 - Website URL
 - Audience
 - Timeframe for Site Content and Development
 - Name of Employee Responsible for Website Maintenance
 - Name of Host
 - Registered Domain Name
 - Approval of vendor and host contracts by the Board of County Commissioners
- “Go Live” Approval requires department personnel to share the URL with the County Administrator or designee for their final review, completed within a timely manner, prior to opening the website for public view.
- For GIS Website Mapping Applications, it is the responsibility of the GIS Department Head to inform the County Administrator or designee that a website mapping application has been created, state its purpose, and do so in a timely manner.

Any employee or official becoming aware of or having knowledge of a website or webpage in violation of the provisions of this policy shall immediately notify his/her supervisor and the County Administrator or designee.

Social Media Guidelines

All Centre County Government social media sites will be established as “**limited public forums**” under the First Amendment and moderated by County staff. Categories of prohibited speech that are subject to deletion must be publicly posted on the social media network to establish the limits of the forum. Unacceptable user-generated posts will be rejected or removed in accordance with the provisions stated in Section 5.c – Comment Limitations for Site Users.

All County employees, volunteers, interns, and contractors managing social media sites on behalf of Centre County must do so using **County-owned equipment**, and register the site with a **County email account** and / or **County phone number**.

Social media sites contain communications that are considered public record (See Section 6: Definitions). Regardless of the form (digital text, photos, audio or video), all content created, received, transmitted, stored on, or deleted from County information systems is a public record exclusively the property of the County, and may be subject to release in connection with **Right-to-Know** requests filed by the public.

To the extent provided by applicable law, content posted on County social media sites that is protected under **copyright or trademark rights** must be recognized as proprietary content of others.

External links included in Centre County's social media sites are provided as a convenience and for information purposes only. They do not constitute an endorsement or an approval of any products, services or opinions of Centre County Government. Furthermore, Centre County Government bears no responsibility for the accuracy, legality or content included on external sites.

Where permitted by the operator of a social media network, public comments and similar functions will be disabled, unless the Department Head (responsible for the social media site) in consultation with the County Administrator determines that permitting or encouraging interactive communications with the site users is necessary to carry out the business objectives of the County department that created the site. After consultation with the Department Head, the Centre County Administrator or designee will take steps to remove **information deemed inappropriate** from the official County and Department social media sites. Also, Centre County Government reserves the right to remove any social media site for repeated non-compliance with this policy.

In accordance with the **1998 Rehabilitation Act, Section 508**, accessibility rights for persons with disabilities who use "assistive technology" (See Section 6: Definitions) requires that text be added to photos and videos to explain what is in the picture or the video. For .pdf documents and .jpg /.tiff photo images posted to social media sites, clearly identify what is in the .pdf document or the photo image and provide an alternate way for the user to obtain the documents and/or photos by listing phone or email contact information. Screen readers, a form of assistive technology cannot interpret images unless there is text associated with it.

Pennsylvania's Sunshine Act requires advance notice of public meetings and stipulates that meeting notices must be published in a newspaper that has a paid circulation equal to or greater than any other newspaper in the geographic area. Social media postings of public meetings, while serving as a valuable means to reach a growing population of users, do not meet the current advertising requirements of Pennsylvania's Sunshine Act.

Employees, volunteers, contractors and interns must also meet the **standards and restrictions** set forth in other **County policies** and must ensure that social media postings are consistent with the County's Sexual Harassment Policy, Conflict of Interest Policy, Electronic Communication Policy, Privacy and Confidentiality Policy, Personal Social Media Usage Policy, and the Workplace Violence Policy. Should an employee engage in any activities expressly prohibited by the foregoing policy list while representing the County on social media, such actions will result in discipline up to and including termination. For any posts containing such content, the County reserves the right to delete the same from its social media pages.

Any **conduct** that adversely affects job performance, the performance of fellow employees or otherwise adversely affects members, customers, suppliers, people who work on behalf of Centre County Government or Centre County Government's legitimate interests may result in disciplinary action.

a. Obligations Required of Department Heads

- i. The approval of the County Administrator is required to establish, use or terminate a social media account presence.

- ii. As new sites are approved, department heads must submit to the County Administrator, a list of all social media accounts maintained by their department including the following information:
 - Name and Internet address of the social media site
 - Date of inception
 - Purpose of the social media site
 - All user names, passwords and other log-in credentials for the account
- iii. Social media pages must clearly identify that the pages are created and managed by an identifiable County department, office, commission, or agency of the County.
- iv. Each County department head, when applicable, shall be responsible for enforcing compliance with this policy.
- v. Department heads shall designate one or more departmental employees to be the authorized social media user(s) for the department and only those employees shall be permitted to post social media content.
- vi. Department heads shall establish a procedure, at their discretion, for approving all social media content prior to posting. Information should be relevant, timely and actionable to the general public, such as:
 - Events and announcements
 - Job opportunities
 - Updates on ordinances, resolutions, policies, programs and other actions of the County
 - Requests for residents' input in the form of surveys and polls
 - Information about community events
 - Updates to the County website including agendas, minutes, photos, existing programs, and new programs
 - Appropriate newsworthy department announcements such as, but not limited to, emergency alerts, traffic and road information, winter weather alerts, open houses, criminal investigations, safety tips, and community issue information.
- vii. No information or hyperlink to any Internet site may be posted on a social media account that is not directly related (as determined by the department head) to the mission, services and/or business objectives of the department.
- viii. Social media pages of all County departments and offices shall:
 - clearly indicate that such pages are maintained by the County;
 - have the County contact information prominently displayed;
 - state that the opinions expressed by visitors to the page(s) do not reflect the opinions of the County, its staff, elected or appointed officials;
 - clearly indicate that posted comments will be monitored and that the County reserves the right to enforce the provisions of this policy, including removal of contents/postings that violate this policy; and
 - clearly indicate that content posted or submitted for posting is subject to public disclosure.
- ix. Statements substantially similar to the following are required:
 - Opinions expressed by visitors to this site do not reflect an endorsement or opinion on the part of Centre County.

- This media site is not owned, controlled, or operated by Centre County. Visitors to this site must comply with the terms of use and privacy policies of the site operator, and are subject to the site operator's practices regarding the collection and retention of passive information and other information from and about visitors to the site.
 - Communications posted by visitors on this site may not contain ethnic slurs or profanity; material that is harassing, defamatory, fraudulent, discriminatory or sexually explicit, or any material that infringes copyright, trademark or other intellectual property rights. Any such communications may be removed at any time without notice.
 - Advertisements appearing on the social media site are not controlled by the County or its departments and do not reflect endorsement by the County.
 - All postings by visitors to this site may be retained by the County, in its discretion and as required by applicable law or County policy.
 - All postings are subject to the Pennsylvania Right-to-Know Law, and other public records and disclosure laws, as well as discovery in litigation. This includes, but is not limited to, information made available through a user's privacy settings on their own social media and other Internet pages.
 - Visitors to this site should have no expectation of privacy or confidentiality with respect to any content they post to this site, and the County and its departments have no responsibility for maintaining any such privacy or confidentiality.
- x. All social media pages maintained by departments shall include a link to this policy and provide notice to all users/posters that content/postings violating this Policy can be removed from the social media pages at the discretion of the County Administrator or designee.

b. Stipulations for Establishing Social Media Sites

No County employee, volunteer, contractor or intern may establish any social media account in the name of or on behalf of the County or any County department or agency unless: (1) the County Administrator AND the department head have both approved the account; and (2) all information to be posted on the account is approved in accordance with the policy. This requirement applies regardless of whether the account is established, accessed, or used by means of County information systems or by means of the employee's or others' information systems, and regardless of whether the account is established, accessed, or used from County or non-County premises.

Social media accounts established by the County or a County department are to be used for County and department business purposes only. No employee shall post a communication(s) on County-authorized social media accounts that is in direct conflict with the purpose of the account.

Any employee or official becoming aware of or having knowledge of a posting in violation of the provisions of this policy shall immediately notify his/her supervisor and the County Administrator or designee.

If interactive communications (i.e. comments) are permitted, terms of use for visitors to the site must be posted prominently on the site, unless prohibited by the social media account or prevented by the social media network. A document titled, "Social Media Comment and Posting – Terms of Use" has been prepared for use by County departments and is attached to this policy as Attachment 2.

Centre County employees, volunteers, contractors and interns are prohibited from engaging in any of the following activities on a social media account established by the County or a County agency. Violations are subject to civil litigation and the County reserves the right to delete these kinds of submissions. Unacceptable postings include:

- i. Vulgar language.
- ii. False information that harms the reputation of another person, group or organization (defamation).
- iii. Ethnic slurs, profanity, personal insults, harassing and discriminatory content, including harassment or disparagement based on race, national origin, sex, sexual orientation, age, disability, veteran status, or religious or political beliefs.
- iv. Private facts and personal information about someone without their permission that has not been previously revealed to the public, is not a legitimate public concern, and would be offensive to a reasonable person.
- v. Using someone else's name, likeness, or other personal attributes without the person's permission for an exploitative purpose; or
- vi. Publishing the creative work, copyright, trademark, or intellectual property rights of another, thereby violating their legal ownership interests or publishing certain confidential business information without the permission of the owner.
- vii. Political, religious, commercial, or other communications on personal topics that are not in the furtherance of the County's operations.
- viii. Display of sexually explicit images, cartoons, jokes or messages, or other material in violation of the County's Equal Employment Opportunity and Anti-Harassment Policies.
- ix. Internal reports, policies, procedures, internal confidential or "for official use only" information that compromises the safety and security of County operations or information systems, or any criminal or civil investigations.
This includes, but is not limited to, information that is protected under the Health insurance Portability and Accountability Act of 1996 (HIPPA) or other federal, state or local laws and regulations as well as social security numbers and other personally identifiable information.
- x. Spam or unauthorized solicitations of any kind.
- xi. Promotion of particular services, products, or political organizations.
- xii. Content that violates the terms of use of the social medium in which it exists.
- xiii. Any use that is illegal or contrary to County policies.

c. Comment Limitations for Site Users

Centre County social media sites and/or pages are established as a "limited public forum" under the First Amendment if visitors to the site are able to post comments or other communications. Please note, that social media sites have their own terms of services, privacy policies, and other rules to which users are subject.

Visitor comments will be rejected or removed (if possible) when the posting includes the following content. Centre County Government will presume that users have read and understand these limitations on their use of Centre County's social media presence.

- i. Obscene, illegal, or threatening language.
- ii. Personal identifying information or sensitive personal information.
- iii. Off-subject or out of context comments. All comments must be topically related to the content of the original posts. Comments and responses that do not directly relate to the content of the original posts will be deleted.
- iv. Copyrighted material.
- v. Language that promotes violence or illegal activities.
- vi. Postings that contain information that could reasonably compromise individual or public safety.
- vii. Promotions or endorsements for political candidates, or ballot measures.
- viii. Commercial advertisements or promotions of a commercial product or service, or an entity or individual.
- ix. Spam, such as the same comment posted repeatedly.
- x. Other content that the Centre County Administrator deems inappropriate.

Section 6: Definitions

Assistive Technology: Tools used by people with disabilities to enable access to information and communication via use of computers to access the Internet. Examples include: screen readers, screen magnification software, and text readers.

Desk Statements: Employee statements, either written or verbal, in response to request from a media source.

Electronic Communication: Communication by computer. Included are six (6) types: web pages, email, forums, text and instant messaging, social networking and video chat.

Blog: A self-published diary or commentary on a particular topic that may allow visitors to post responses, reactions, or comments. The term is short for “Web Log.”

External Site(s): Text and images with clickable hyperlinks that lead the reader to another website outside of a Centre County social media site.

Limited Public Forum: Established within the parameters of the First Amendment, a limited public forum permits expressive activity with restrictive subject matter when reasonable limitations have been adopted.

Map Applications: A Geographic Information System (GIS) web map interactive display of geographic information that provides options to consumers who may choose what the map will show.

Op-Ed Comments: Short for “opinion editorial” is a narrative typically published by a newspaper that expresses the opinion of an individual not affiliated with the publication’s editorial board.

Page: The specific portion of a social media website where content is displayed and managed by an individual or individuals with administrator rights.

Public Information Officer (PIO): The designated County Public Information Officer is the County Administrator who serves as the official spokesperson for the County.

Record: Social media records qualify as public records. Information, regardless of physical form or characteristics, that documents a transaction or activity of an agency and is created, received or retained pursuant to the law or in connection with a transaction, business or activity of an agency. The term includes a document, paper, letter, map, book, tape, photograph, film or sound recording, information stored or maintained electronically and a data-processed or image-processed document. (PA Right-to-Know, Section 102. Definitions).

Right-to-Know: Laws or policies that make certain government data and records available to any individual who has a right or need to know their contents.

URL: Uniform Resource Locator is the internet address of a website, webpage or document on a computer network and provides the source for locating and retrieving the site, page or document.

Wiki: Web page(s) that can be edited collaboratively.

Section 7: Related Policies

Business Integrity Policy
Electronic Communication Policy
Personal Social Media Usage Policy
Privacy and Confidentiality Policy
Right-to-Know Policy
Sexual Harassment Policy
Workplace Violence Policy

Repealer and Severability:

All prior policies and/or directives or parts of policies and/or directives that are contrary to the provisions of this policy are hereby repealed to give this policy full force and effect.

If any section, clause, sentence, provision, or any part of this policy is held to be invalid or unconstitutional, the remaining sections, clauses, sentences, or parts not included therein, will remain in full force.

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ATTACHMENT 1:

Centre County Government – Format for Press Releases

The following format, using Kannada MN font, size 11, should appear on the letterhead of the Centre County Board of Commissioners. A subject title should be included and appear in bold font / all capitals. The line spacing in the body of the release should be 1.5 lines. The font style and size used for the text / body of the release should be a standard legible font, like Calibri or Aerial. Place three pound signs, like this “###”, at the bottom of the release to signify the end of the material submitted.

ISSUED: (date distributed)

FOR IMMEDIATE RELEASE: (date matches date of issue)

Contact for Additional Information: Centre County Commissioners Office, 814-355-6700

INSERT SUBJECT TITLE

Text (spacing 1.5 lines)

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If your press release is not to be published until a specific date, change the wording from, “FOR IMMEDIATE RELEASE:” to “HOLD FOR RELEASE UNTIL:” (insert date)

ATTACHMENT 2:

Centre County Government Social Media Comment & Posting – Terms of Use

We welcome your participation and comments through the various Centre County Government social media sites. These sites are governed by the general rules of respectful civil discourse. You are fully responsible for everything that you post.

Centre County Government does not discriminate against any views. Nevertheless, the County may monitor user-generated content and reserves the right to remove content, without consent.

Please follow these rules when posting comments. Disregard for these rules will result in the removal of your comments.

- Please stay on topic. We will remove content that is clearly off-topic.
- We will remove content that contains abusive, vulgar, offensive, racist, threatening or harassing content, personal attacks of any kind, or offensive terms that target specific individuals or groups.
- We will remove spam and content that promotes services or products, or that involves political campaigning or lobbying.
- We will remove content that contains personal information (whether your own or someone else's), including home address, home or cell phone number, or personal e-mail address, in order to protect privacy.
- Links to sites and repeat submissions of the same content (or very similar) are viewed as spam and may result in the content being removed.
- Do not post anything that you do not have the right to post. Photos must be owned or copyrighted by the person / user uploading the photo.

Thank you for joining the conversation.